

000936



June 13, 1995



Reply to
Attn. of: BW-106

Mr J. David Burtelman
FMC Corporation
Phosphorous Chemicals Division
Pocatello, Idaho 83205

**Re: Proposed RCRA Ground-Water Monitoring Reductions for the FMC
Pocatello Facility, EPA ID# 07092 9518**

Dear Mr. Buttelman:

In response to your May 22, 1995 letter, regarding a request for approval of a reduced analytical parameter list in your quarterly ground-water monitoring program the Environmental Protection Agency (Agency) has completed a technical review of the proposal. Under Part 265.93 (d) (4) and (7), the facility is responsible for determining the rate and extent of migration of the hazardous constituents in the groundwater and the concentrations of the waste constituents. The RCRA interim status ground-water program is largely self implementing. For this reason the Agency is unable to respond to requests for specific "approval" of your ground-water assessment plan components.

While the Agency does not offer specific approval of your proposed list, I would like to provide one technical comment. The reasons for eliminating parameters provided in your May 22 letter are similar to those developed in depth during previous meetings. With the exception of those arguments pertaining to cadmium, the reasons given are generally acceptable to the Agency. However, I believe FMC ought to consider retaining cadmium because it is a major component of your waste streams and could be reasonably expected to be present in site ground water. Acting within a technical support role, the Agency recommends that cadmium remain on the proposed analyte list.

The proposed analyte list is a significant reduction from 34 inorganic parameters and 4 radiological parameters to 10 inorganic parameters with no radiological parameters. The Agency agrees that this reduction appears appropriate at this stage of site characterization. It is, however, possible that FMC will further refine the conceptual model for the complex hydrogeologic system under study at this site. As this occurs, the facility may select additional parameters to be added to the list and should not hesitate to do so.

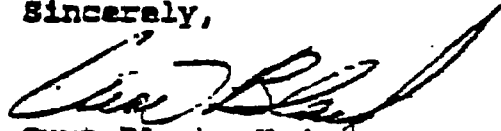
Page Two

FMC Pocatello RCRA Analyte List, amended as discussed above:

Heavy Metals --	Arsenic, Cadmium, and Selenium
Water Quality --	Chloride, Fluoride, Potassium, Sulfate, Ammonia, Nitrate, and Orthophosphate
Field Parameters --	pH, Turbidity, Temperature and Specific Conductance

Should you have any questions or comments regarding this letter, or the effect of this program with regard to your site, please feel free to contact me at (206) 553-1262.

Sincerely,



Curt Black, Hydrogeologist
RCRA Permits Team
Hazardous Waste Division

cc: Sylvia Burges
Bill Adams
Mark Masarik, Idaho
Operations Office